

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Conditional Major Draft Permit Renewal No. F-03-014

MPD INC.

OWENSBORO, KENTUCKY

May 15, 2003

WILSON TAN, REVIEWER

Plant I.D. # 21-059-00016

Application Log # 53569

**SOURCE DESCRIPTION:**

MPD Inc., an existing conditional major source (for HAP) submitted a permit renewal application to its existing S-96-054 and S-96-211 permit.

MPD Inc. has three subsidiary companies onsite: CMI makes breath-alcohol instrumentation for police departments, MPH makes radar guns for police departments, and MPD Components makes electronics for the Dept. of Defense. All of the companies are electronic in nature and all of MPD Inc.'s customers are either governments or military contractors.

**COMMENTS:**

**Emission Unit 1( ): Marshall Claude and Unique Industries Degreasers**

- a. This emission point consists of 5 degreasers.
- b. The worst-case control efficiency of 30% was obtained from AP-42.

Degreaser	Installation date	Max. amount used	Control Device
Marshall Claude degreaser (model #1618, serial #84-5660)	Pre-1987	0.09 gals/hr and 95 gals/yr	Refrigerated Chiller and Reduced Room Draft
Marshall Claude degreaser (model #1618, serial #84-5954)	Pre-1987	0.03 gals/hr and 5 gals/yr	Refrigerated Chiller and Reduced Room Draft
Unique Industries degreaser (model #LP1618, serial #0200590)	Pre-1987	0.08 gals/hr and 110 gals/yr	Refrigerated Chiller and Reduced Room Draft
Unique Industries degreaser (model #LP1618, serial #430588)	1989	0.05 gals/hr and 21 gals/yr	Refrigerated Chiller and Reduced Room Draft
Marshall Claude degreaser (model #1618, serial #34396-2)	Pre-1987	0.05 gals/hr and 64 gals/yr	Refrigerated Chiller and Reduced Room Draft

- c. Applicable requirements were obtained from 40 CFR 63, Subpart T – National Emission

## Standards for Halogenated Solvent Cleaning.

### **Emission Unit 2( ): Boilers**

- a. This emission point consists of 4 boilers:
  - (i) 35789 Weil McLain Boiler (3.23 mmBTU/hr & 1985)
  - (ii) 68194 Weil McLain Boiler (3.23 mmBTU/hr & 1981)
  - (iii) 63106 Cleaver Brooks Boiler (6.275 mmBTU/hr & 1975)
  - (iv) 39739 Sellers Boiler (4.185 mmBTU/hr & 1999)
- b. Applicable requirements were obtained from 401 KAR 59:015 – New indirect heat exchangers.
- c. The boilers were grouped together to calculate the source-wide PM and SO<sub>2</sub> allowable emissions.

### **Insignificant Activities:**

- a. Boilers, which consist of 34476 Weil McLain boiler, 18584 Basmor boiler, and 6035 Basmor boiler.
- b. Anodizing Lines (7-52 & 7-53) – A new process line that is not in the old permit.
- c. Metal Plating Lines (6A-DX)
- d. Tiyoda-Serec degreaser (model #1400, serial #062) – Installation date was March 2003:  
The Tiyoda-Serec degreaser employs a new technology whereby the parts to be degreased are not placed in a basket and lowered into the solvent vapor zone. With the Tiyoda-Serec unit, the parts are placed into a sealed chamber (to reduce emissions) wherein the solvent vapor is pumped into then out of the chamber. The solvent vapors are condensed with a refrigerated chiller but the cooling coils are not in direct contact with the degreasing chamber as in traditional degreasers. Maximum hourly and yearly use of Trichloroethylene is 0.00025 gals/hr and 0.5 gals/yr respectively.

### **EMISSION AND OPERATING CAPS DESCRIPTION:**

Trichloroethylene (HAP) emissions from each solvent cleaning machine (degreaser) shall be equal to or less than 150 kilograms/square meter/month on a 3-month rolling average.

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.